

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. Nos. 25700 & 25734

**CERTIFICATION OF COUNSEL REGARDING DEBTORS' ONE HUNDRED THIRD
(SUBSTANTIVE) OMNIBUS OBJECTION TO CERTAIN OVERSTATED
AND/OR UNLIQUIDATED PROOFS OF CLAIM (CUSTOMER CLAIMS)**

I, Kimberly A. Brown, counsel to FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (the “Debtors”) hereby certify as follows to the best of my knowledge, information and belief:

1. On September 25, 2024, the Debtors filed the *Debtors' One Hundred Third (Substantive) Omnibus Objection to Certain Overstated and/or Unliquidated Proofs of Claim (Customer Claims)* [D.I. 25700, redacted & 25734, sealed] (the “Objection”).

2. Pursuant to the Notice of Objection attached to the Objection [D.I. 25700-1 & 25734-1], any responses to the Objection were to be filed no later than November 11, 2024 at 4:00 p.m. (ET) (the “Response Deadline”).

3. The Debtors received an informal response (the “Informal Response”) to the Objection from the holder of claim number 216.

4. On October 29, 2024, Alin Florea (“Florea”) filed a response to the Objection

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

[D.I. 27332] (the “Florea Response”).

5. On November 14, 2024, Gerhard Schulenberg (“Schulenberg”) filed a response to the Objection [D.I. 27943] (the “Schulenberg Response”).

6. On November 26, 2024, Joshua Rablin (“Rablin”) filed a response to the Objection [D.I. 28410] (the “Rablin Response”).

7. As of the Date hereof, no other formal responses or other responses to the Objection have been filed or served on the Debtors.

8. The Debtors are withdrawing the Objection solely with regard to claim number 1458 without prejudice and with all rights of the parties reserved with regard thereto.

9. The Debtors have revised the proposed form of order (the “Revised Order”), a copy of which is attached hereto as **Exhibit A**, to reflect the withdrawal and adjournments of the Objection solely as to the Florea, Schulenberg, and Rablin claims and proof of claim number 216. A copy of the Revised Order compared against the proposed form of order attached to the Objection is attached hereto as **Exhibit B**. In accordance with the Court’s electronic order processing procedures, a clean copy of the Revised Order shall be uploaded to CM/ECF.

10. Accordingly, the Debtors respectfully request that the Court enter the Revised Order at its earliest convenience.

Dated: December 26, 2024
Wilmington, Delaware

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/s/ Kimberly A. Brown

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